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Attorneys for Defendant
CITY OF MILLBRAE

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

REBECCA ROSENBLATT,

Plaintiff,

v.

CITY OF MILLBRAE, and DOES 1 -
50, inclusive,

Defendant.

No. C11-01891 EMC

**STIPULATION AND PROPOSED ORDER
FOR CONTINUANCE OF CASE
MANAGEMENT CONFERENCE**

Pursuant to a Clerk's Notice dated July 15, 2011, an Initial Case Management Conference in Case No. C11-01891 EMC was re-set for August 1, 2011. However, conflicts exist on that date for lead counsel for Defendant, who will be appearing at the Conference on its behalf. The parties have therefore met and conferred regarding the date of the Conference, and Plaintiff's counsel has agreed to continue it to a later date.

Accordingly, Defendant CITY OF MILLBRAE, through its attorneys of record, Hanson Bridgett LLP, and Plaintiff REBECCA ROSENBLATT, through her attorneys of record, Lackie, Dammeier and McGill, APC, hereby stipulate and agree to continue the Initial Case Management Conference in Case No. C11-01891 EMC, currently set for August 1, 2011 at 1:30 p.m., until August 19, 2011 at 9:00 a.m., or such other date and

1 time that this Court may set for the Conference. The parties respectfully request the
2 Court grant this continuance.

3 Pursuant to the Court's April 20, 2011 Order Setting Initial Case Management
4 Conference, the parties stipulate and agree to file their Joint Case Management
5 Statement and complete any other activities and filings required to be completed before
6 the Initial Conference by seven days in advance of the continued Conference.

7 This stipulation is made pursuant to Local Rules 6-1 and 6-2 of the United States
8 District Court for the Northern District of California, and is based upon this stipulation and
9 proposed order, the attached Declaration of Mark Gabel, and any other matters that the
10 Court may wish to consider.

11 IT IS SO STIPULATED.

12
13 DATED: July 21, 2011

LACKIE, DAMMEIER & MCGILL, APC

14
15 By: /s/ Dale Nowicki
16 MICHAEL A. MCGILL
17 DALE G. NOWICKI
18 RUSSELL M. PERRY
Attorneys for Plaintiff Rebecca
Rosenblatt

19 DATED: July 21, 2011

HANSON BRIDGETT LLP

20
21 By: /s/ Mark C. Gabel
22 M. D. MOYE
23 MARK C. GABEL
Attorneys for Defendant
CITY OF MILLBRAE

[~~PROPOSED~~] ORDER

Pursuant to the Stipulation above, the Initial Case Management Conference previously scheduled for August 1, 2011 at 1:30 p.m. is hereby continued to August 19, 2011 at 9:00 a.m. The Parties will file their Joint Case Management Statement in advance of the continued Conference on or before August 12, 2011.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 7/25/11

By: _____

THE HONORABLE EDWARD M. CHEN
UNITED STATES JUDGE

